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PUC DOCKET NO. 42063

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APPLICATION OF SHARYLAND §
UTILITIES, L.P. TO AMEND ITS §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY FOR THE §
PROPOSED ANTELOPE-ELK §
ENERGY CENTER TO WHITE §
RIVER 345-KV TRANSMISSION §
LINE IN HALE AND FLOYD §
COUNTIES §

PUBLIC UTILITY COMMISSION

OF TEXAS

**MOTION TO INTERVENE OF LISSA ROGERS, AS TRUSTEE OF THE ROGERS
REVOCABLE TRUST, AND VICKIE ROATH**

NOW COME, Lissa Rogers, as Trustee of the Rogers Revocable Trust, and Vickie Roath (collectively, "Intervenors"), and file this Motion to Intervene in the above-styled and docketed proceeding pursuant to P.U.C. Proc. R. 22.101, 22.103 and 22.104, and in support thereof respectfully show the following:

1. On December 13, 2013, Sharyland Utilities, L.P. ("Sharyland") filed its Application to Amend its Certificate of Convenience and Necessity for the Proposed Antelope-Elk Energy Center to White River 345-kV Transmission Line in Hale and Floyd Counties ("Application"). Sharyland's Application included Intervenors as directly affected landowners of property in Floyd County, Texas.

2. Intervenors have standing to intervene in this proceeding, as that term is defined in P.U.C. Proc. R. 22.103(b)(2), because Intervenors have a justiciable interest that may be adversely affected by the outcome of this proceeding. As stated above, certain properties in Floyd County are owned by Intervenors. Intervenors have received notice from Sharyland that said properties may be directly affected, as that term is defined in P.U.C. PROC. R. 22.52(a)(3), by the proposed transmission line that is the subject of this proceeding. This Motion to Intervene is filed before January 27, 2014, and therefore is timely under Order No. 1 in this docket.

3. Attorneys Todd W. Boykin and Mindi L. McLain, pursuant to P.U.C. PROC. R. 22.101(a), hereby notice their appearance as counsel on behalf of Intervenors in the above-styled and docketed proceeding. The name, address, telephone number, and email address for Intervenors' legal counsel are as follows:

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BURDETT MORGAN WILLIAMSON & BOYKIN, LLP
Todd W. Boykin – tboykin@bmwb-law.com
Mindi L. McLain – mmclain@bmwb-law.com
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Intervenors request that the Public Utility Commission of Texas and all parties to this proceeding serve copies of all notices, correspondence, pleadings, discovery, and other documents upon the authorized representatives at the address shown above.

WHEREFORE, PREMISES CONSIDERED, Intervenors respectfully request that this Motion to Intervene be granted, that Intervenors be allowed to participate in this proceeding as parties with all rights thereof to the full extent Intervenors desire to do so, and for such further relief to which Intervenors may be entitled.

Respectfully submitted,

BURDETT MORGAN WILLIAMSON & BOYKIN, LLP
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By: Mindi L. McLain
Todd W. Boykin
State Bar No. 02791600
Mindi L. McLain
State Bar No. 24066814
ATTORNEYS FOR INTERVENORS

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record in this proceeding on January 16, 2014, in the following manner: via facsimile or first class U.S. mail.

Mindi L. McLain
Mindi L. McLain